

The following comments are submitted on behalf of the Whole Person. The Whole Person is a center for independent living in Kansas City, Missouri, connecting people with disabilities to the resources they need to live full and independent lives.

We live in a world where mobile phone devices are increasingly more often the vehicles of choice for accomplishing work and accessing information and personal entertainment. The constantly expanding number of applications capable of performing an ever widening variety of tasks knows no bounds, and miniaturization along with the rapid development of new technologies makes products almost obsolete as soon as they are released.

It is no wonder that people who are blind, visually impaired and deaf-blind are frustrated that there is only one phone manufactured with complete built-in accessibility and only a few smart phones compatible with add on screen-to-text software which costs much more than the phones themselves. Some basic cell phones and other feature phones can not even be made accessible as currently designed.

Since so little progress has been made toward better accessibility for most mobile devices, access to functionality such as calling other phones is restricted to memorizing telephone numbers and specific key sequences. Additional features such as battery status, message indicators, caller identification, and sending or receiving text messages (including emergency information that is increasingly made available via text messages) is not available to people who are blind or deaf-blind.

The Whole Person is distressed to see how people who are blind and deaf-blind have been left out of this life changing technological revolution which has brought so many conveniences to the lives of people who are non-disabled, and unless strong measures for greater accessibility and inclusion are required and meaningfully implemented, this unacceptable situation will only continue to worsen.

Microsoft, Nokia and Research in Motion sadly miss the mark of making their products accessible, with mobile phones to be released by Microsoft in October of 2010 featuring no accessibility for blind, deaf-blind, and visually impaired consumers. In fact, phones operating under the windows system will not even be capable of working with speech to text software, unbelievably representing a step backward for accessibility. Research in Motion, creator of the Blackberry, has chosen to pass the costs of accessibility along to disabled consumers, making the price 2 to five times what the products are for the non-disabled.

Apple Corporation stands alone in its willingness to create a fully accessible product, and is to be highly commended for doing so. Google's™ android operating system has not been successful to date in providing much needed accessibility for consumers who require it, though they have stated they are committed to trying.

Accessibility is provided through speech and braille interfaces, and The Whole Person is grateful to the American Foundation for the Blind for the important work they do testing cell phones. Braille is especially necessary for the deaf-blind population, at most risk of being left even further behind if accessibility features are not mandated, regardless of cost, some of which can be minimized by changes in carrier policies. To quote the American Council of the Blind, "considering the fact that mobile wireless devices are much more than boxes to make phone calls, it is vital that they provide full and equal access to all phone functions to all consumers whether or not they have sensory disabilities. This functionality includes but is not limited to the following:

- \* access all menus
- \* edit contacts
- \* read messages
- \* send and receive text messages
- \* read caller-ID
- \* determine battery status
- \* access the Internet including entertainment options available on the phone
- \* have access to all built-in applications that accompany the phone"

Since Apple Corporation has proven that equal access to mobile devices is achievable and affordable, consumers who are blind, low vision and deaf-blind have every right to expect the FCC to step up to the plate and require accessibility and fairness in manufacturer and carrier business practices and policies. Consumers with sensory disabilities should not be required to spend hundreds of dollars annually to purchase add on software, new devices and to upgrade contracts solely for the purpose of attempting to gain access to the same products and information everyone else can purchase more cost effectively and which in many cases, these disabled individuals still can't use. Options must be made available for a variety of products and price ranges, and neither should businesses, educational institutions, not for profits, nor governmental entities be subject to bearing these inequitable costs.

The Whole Person thanks the FCC for this opportunity to comment on removal of serious barriers to access for individuals who are blind, low vision and deaf-blind, and we sincerely hope that the necessary steps will be taken to remove them.

Respectfully submitted

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